

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Shelby Ratliff,) FILE NO.: _____
Plaintiff,) NOTICE OF REMOVAL OF
v.) CIVIL ACTION UNDER 28
Target Corporation, ABC Corps #1-3) U.S.C. § 1441(a)
and John Does #1-3,)
Defendants.) **(DIVERSITY JURISDICTION)**
) (Removed from the State Court
) of the State of Georgia, County
) of Douglas, File No.
) 23SV00012)
) JURY TRIAL DEMANDED
)

**DEFENDANT TARGET CORPORATION'S
CERTIFICATE OF INTERESTED PERSONS AND
CORPORATE-PARTY DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1 and Local Rule 3.3, Defendant Target Corporation ("Target") files its Certificate of Interested Persons and Corporate Disclosure Statement as follows:

(1) The undersigned counsel of record for a party to this action certifies that the following is a full and complete list of all parties in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party:

a. Plaintiff Shelby Ratliff; and

b. Defendant Target Corporation.

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case:

a. Mitchell B. Ladson;

b. Morgan & Morgan

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties in this proceeding:

a. Mitchell B. Ladson (Morgan & Morgan) for Plaintiff Shelby Ratliff; and

b. Sharonda B. Barnes and Francesca G. Townsend (Huff, Powell & Bailey, LLC) for Defendant Target Corporation.

This 17th day of February, 2023.

HUFF, POWELL & BAILEY, LLC

/s/ Sharonda B. Barnes

SHARONDA BOYCE BARNES
Ga. Bar No. 245438

/s/ Francesca G. Townsend

FRANCESCA G. TOWNSEND
Ga. Bar No. 309045

*Counsel for Defendant
Target Corporation*

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rules 5.1(B) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font and size requirements and is formatted in Times New Roman, 14-point font.

HUFF, POWELL & BAILEY, LLC

/s/ Sharonda B. Barnes

SHARONDA BOYCE BARNES
Ga. Bar No. 245438

/s/ Francesca G. Townsend

FRANCESCA G. TOWNSEND
Ga. Bar No. 309045

*Counsel for Defendant
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing DEFENDANT TARGET CORPORATION'S RULE 7.1 CORPORATE-PARTY DISCLOSURE STATEMENT upon all parties or their counsel of record via CM/ECF's Electronic Case Filing System and by Statutory Electronic Service, addressed as follows to assure delivery to:

Mitchell B. Ladson
Morgan & Morgan
408 12th Street Suite 200
Columbus, Georgia 31901
mladson@forthepeople.com

This 17th day of February, 2023.

HUFF, POWELL & BAILEY, LLC

/s/ Sharonda B. Barnes

SHARONDA BOYCE BARNES
Ga. Bar No. 245438

/s/ Francesca G. Townsend

FRANCESCA G. TOWNSEND
Ga. Bar No. 309045

*Counsel for Defendant
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